

ATTACHMENT A  
STATEMENT OF FACTS: GINETTE F. TCHAYA-TCHONTA

DEC 10 2012

AT GREENBELT  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

DEPUTY

*W*  
*ACB* The United States and the Defendant agree that if this case proceed to trial, the United States would prove the following facts below beyond a reasonable doubt. The parties agree that these are not all of the facts that would have been proved if this case proceeded to trial.

*ACB* *5/2011* **GINETTE F. TCHAYA-TCHONTA ("TCHAYA-TCHONTA")** was born in Cameroon in 1979<sup>4</sup> and entered the United States on a tourist visa on February 23, 1999. **TCHAYA-TCHONTA** applied for political asylum (Temporary Residence) in June 1999. On February 22, 2000, the Immigration and Naturalization Service denied **TCHAYA-TCHONTA**'s asylum request. **TCHAYA-TCHONTA**'s immigration case was completed after dismissal of her appeal on February 10, 2003 and her case was turned over to ICE's deportation branch for her removal.

*ACB* *5/2011* At some point before November 22, 2012, **TCHAYA-TCHONTA** obtained the social security number, birth certificate, and other identifying information of R.C.S., an actual U.S. citizen. **TCHAYA-TCHONTA** also obtained a fake District of Columbia identification card bearing R.C.S.'s name but containing the former's picture. On or about November 22, 2012, **TCHAYA-TCHONTA** executed a DS-11, Application for United States Passport, at the U.S. Post Office in Bethesda, Maryland. That DS-11 was filled out with R.C.S.'s personal information including her date of birth, parental information, place of birth, and social security number, but bore **TCHAYA-TCHONTA**'s photograph. Included with that application was R.C.S.'s birth certificate.

On December 2, 2011, State Department passport examiners requested additional information to substantiate the R.C.S. passport application. Subsequently, **TCHAYA-TCHONTA** contacted R.C.S. to obtain the additional background information requested by the State Department. This information included R.C.S.'s childrens' birth certificates, rental agreement, baptismal record, and school records. **TCHAYA-TCHONTA** also caused a falsified birth affidavit (DS-10) in the name of R.C.S.' mother to be executed, and submitted that along with the Supplemental Identification Worksheet to the State Department. The State Department accepted the information and issued a U.S. Passport in R.C.S.'s name on December 15, 2011.

On July 11, 2012, **TCHAYA-TCHONTA** fled the United States to Canada and crossed the international border at Niagara, New York, using the R.C.S. passport. She was accompanied by her common law husband, Christel Valery Tchoufac-Ndingue. Both **TCHAYA-TCHONTA** and Tchoufac-Ndingue knew that agents had visited her sister's home looking for her and that a friend, Robert Tchammouo, who had also made a falsified passport application using the identity of R.C.S.' son, had been arrested the previous day. On October 9, 2012, **TCHAYA-TCHONTA** voluntarily returned to the United States from France and surrendered herself to arrest.

I have read this statement of facts, and have carefully reviewed it with my attorney. I acknowledge that it is true and correct.

12/3/12

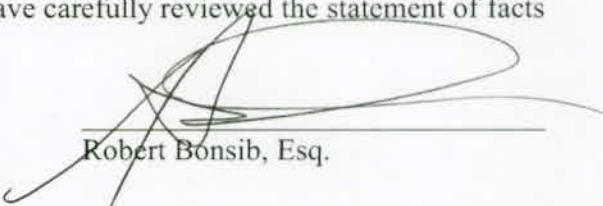
Date

  
Ginette F. Tchaya-Tchonta

I am Ginette Tchaya-Tchonta's attorney. I have carefully reviewed the statement of facts with him.

12/3/12

Date

  
Robert Bonsib, Esq.